

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

MWK RECRUITING, INC.

Plaintiff,

v.

**EVAN P. JOWERS, YULIYA
VINOKUROVA, ALEJANDRO VARGAS,
and LEGIS VENTURES (HK) COMPANY
LIMITED (aka Jowers / Vargas),**

Defendants.

Civil Action No. 1:18-cv-00444

EVAN P. JOWERS

Counterclaimant,

v.

**MWK RECRUITING, INC., ROBERT E.
KINNEY, MICHELLE W. KINNEY,
RECRUITING PARTNERS GP, INC.,
KINNEY RECRUITING LLC, COUNSEL
UNLIMITED LLC, and KINNEY
RECRUITING LIMITED**

Counter-defendants.

UNOPPOSED MOTION TO WITHDRAW AS COUNSEL

Marc D. Katz, James C. Bookhout, and Marina Stefanova of the law firm DLA Piper LLP (US) file this unopposed motion to withdraw as counsel of record in this case.

1. Marc D. Katz, James C. Bookhout, and Marina Stefanova of DLA Piper LLP (US) (“**DLA Piper**”) request the Court’s permission to withdraw as counsel of record for Defendant in this case pursuant to Texas Disciplinary Rule of Professional Conduct 1.15(b)(1) and 1.15(b)(7)

because DLA Piper and Mr. Jowers are unable to reach agreement with respect to the continued development of this matter.

2. Further, Robert Tauler, an attorney with the firm of Tauler Smith LLP and present counsel of record for Defendant, will remain as counsel of record in this case. Therefore, DLA Piper's withdrawal as counsel will not materially adversely affect Mr. Jowers.

3. The withdrawal is not being requested for purposes of delay. The withdrawal comes well before the close of discovery on October 13, 2020. Trial is set for February 22, 2021.

4. DLA Piper conferred with Robert Kinney, counsel for Plaintiff MWK Recruiting, Inc. and all Counter-Defendants, and Mr. Kinney indicated that he is not opposed to the relief sought in this motion.

5. Mr. Katz, Mr. Bookhout, and Ms. Stefanova respectfully request that they and their firm, DLA Piper, be permitted to withdraw as counsel for Defendant and that they be discharged from further responsibilities as counsel for Defendant in this case.

6. Therefore, Mr. Katz, Mr. Bookhout, and Ms. Stefanova request that the Court grant this Motion to Withdraw and award them all other relief, at law or in equity, to which they may be entitled.

Dated: June 3, 2020.

Respectfully submitted,

By: /s/ Marc D. Katz

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**COUNSEL FOR DEFENDANT AND
COUNTER-CLAIMANT EVAN P. JOWERS**

CERTIFICATE OF CONFERENCE

I hereby certify that, on June 1, 2020 I conferred via email with Robert Kinney, counsel for Plaintiff MWK Recruiting, Inc. and all the Counter-Defendants, regarding the subject matter of this Motion, and he stated that he was unopposed to the relief sought herein.

/s/ Marc D. Katz

Marc D. Katz

CERTIFICATE OF SERVICE

I hereby certify that, on June 3, 2020, a true and accurate copy of the foregoing document was served via the Court's CM/ECF facilities and via email to all counsel of record.

/s/ Mark D. Katz

Marc D. Katz